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June 23, 2015

By ECF

The Hon. John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: United States v. Agron Hasbajrami,
11 Cr. 623 (JG)***

Dear Judge Gleeson:

We represent Defendant Agron Hasbajrami in the above-referenced matter. Yesterday the Government disclosed verbatim translations of discovery (*i.e.*, emails) previously provided only in its original language, Turkish. Should a trial become necessary, it appears that the Government intends to rely upon these translations at trial. As such, we write to respectfully request authorization to enlist a Turkish interpreter, AJ Elterman, to review the accuracy of the Government's proposed translations and to bill her services under the Criminal Justice Act, 18 U.S.C. § 3006A.

This Court had previously authorized the defense to enlist Ms. Elterman to translate classified discovery. Ms. Elterman's security clearance remains pending, however the verbatim translations disclosed yesterday by the Government do not require security clearance to review.

Specifically, there are approximately 92 emails included in the Government's verbatim translations. The emails range in length from one line to a full page. We estimate that Ms. Elterman would require no more than 40 hours to confirm the accuracy of the Government's translations and/or alert us to any objections that we might need to raise. To the extent she has any time remaining on this estimate, her services could also be used to assist the defense in relation to translating other *unclassified* articles of discovery that the Government does not appear to be relying upon but that might assist the defense.

Accordingly, the defense respectfully requests this Court's authorization to enlist the services of a Turkish interpreter, AJ Elterman, to review unclassified discovery; to permit Ms. Elterman to bill her services related to *unclassified* discovery pursuant to the Criminal Justice Act, up to 40 hours without further authorization from this Court.

The Hon. John Gleeson

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MKB', with a long, sweeping horizontal line extending to the right.

Michael K. Bachrach

Steve Zissou

Joshua L. Dratel

Attorneys for Defendant Adgron Hasbajrami

MKB/mb

cc: AUSA Seth DuCharme